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13 UNITED STATES DISTRICT COURT

14 NORTHERN DISTRICT OF CALIFORNIA

15 SAN FRANCISCO DIVISION

16 SONOS, INC.,

17
18 Plaintiff and Counter-
19 Defendant,

20 vs.

21 GOOGLE LLC,

22 Defendant and Counter-
23 Claimant.

Case No. 3:20-cv-06754-WHA

Related to Case No. 3:21-cv-07559-WHA

**DECLARATION OF NIMA HEFAZI IN
SUPPORT OF GOOGLE LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF ITS TRIAL
BRIEF**

1 I, Nima Hefazi, declare and state as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am counsel at Quinn Emanuel Urquhart & Sullivan LLP representing
4 Google LLC (“Google”) in this matter. I make this declaration in support of Google’s
5 Administrative Motion to File Under Seal Portions of its Trial Brief (“Google’s Administrative
6 Motion”). If called as a witness, I could and would testify competently to the information contained
7 herein.

8 2. Google’s Administrative Motion seeks an order sealing the portion of its Trial Brief
9 that is highlighted in green. The information Google seeks to seal relates to usage data and metrics
10 that Google maintains confidentially and public disclosure of this information could provide
11 competitors with information about the how often certain features are used by Google’s customers.
12 Public disclosure of this information would harm the Google’s competitive standing and create a
13 risk of injury by providing competitors with access to information that Google does not have similar
14 access to about their competitors, allowing them to gain a competitive advantage in the marketplace.
15 If such information were made public, I understand that Google’s competitive standing would be
16 significantly harmed. Google has therefore designated this usage data and metric information as
17 HIGHLY CONFIDENTIAL—ATTORNEYS’ EYES ONLY under the protective order (Dkt. 92).

18 I declare under penalty of perjury that to the best of my knowledge the foregoing is true and
19 correct. Executed on April 26, 2023, in San Francisco, California.

20 DATED: April 26, 2023

21 By: /s/ Nima Hefazi
22 Nima Hefazi
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ATTESTATION

I, Sean Pak, am the ECF user whose ID and password are being used to file the above Declaration. In compliance with Civil L.R. 5-1, I hereby attest that Nima Hefazi has concurred in the aforementioned filing.

DATED: April 26, 2023

/s/ Nima Hefazi

Nima Hefazi